

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
JACKSON DIVISION

BREANA SCHENK, as next  
best friend to Ev M,  
Em M, and El M and the ESTATE OF  
KELSEY DELYLAH SCHENK-McKEE,  
Plaintiff,

vs.

No. 1:22-cv-01268-STA-jay  
JURY DEMAND

PAUL A. THOMAS, GIBSON COUNTY  
SHERIFF; and DANNY LEWIS, Chief Deputy  
Gibson County Sheriff's Department and TAMELA DENISE COX,  
Chief Jailor/Correction Officer of the  
Gibson County Sheriff's Department and  
WILLIAM HOLBROOK, Deputy/Correction Officer and  
JAILER PRINCE, JAILER LITRELL, JAILER  
HILL, JAILER MORGAN, JAILER STURDIVANT,  
JAILER WATSON, JAILER GILLES, JAILER  
MEESE, JAILER MCARTY, JAILER YARBROUGH,  
JAILER KEEL, JAILER PALMER, JAILER DANCE,  
JAILER ABRAHAM, JAILER MCMINN, JAILER BAILEY,  
and GIBSON COUNTY, TENNESSEE.

Defendants.

MOTION AND MEMORANDUM FOR EXTENSION OF TIME

Comes now the Plaintiff, by and through her attorney, and moves the court,  
pursuant to the Federal Rules of Civil Procedure , to grant an extension of time of ten (10)  
days to respond to Defendant's Motion to Dismiss. For grounds, Plaintiff's attorney  
would state he has been in trials and mediations since the filing of said Motion on  
February 20. Plaintiff has contacted defense counsel and was advised they have no  
objection.

Wherefore Plaintiff moves that Plaintiff be granted a ten (10) day extension until March 30, 2023 in which to respond.

Respectfully Submitted,  
/s/ Robert T. Keeton III  
ROBERT T. KEETON III, BPR# 013296  
Keeton Law Offices  
20240 East Main Street  
P. O. Box 647  
Huntingdon, TN 38344  
731-986-4444  
[KeetonLawOffices@KeetonLaw.net](mailto:KeetonLawOffices@KeetonLaw.net)

Certificate of Consultation

I certify that I consulted defense counsel and that they had no objection.

/s/ Robert T. Keeton III  
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Certificate of Service

The undersigned hereby certificate that a true and correct copy of the foregoing document was served via the U.S. District Court ECF system upon:

Nathan D. Tilly  
162 Murray Guard Drive, Suite B  
Jackson, Tennessee 38305  
[ntilly@pgmfirm.com](mailto:ntilly@pgmfirm.com)

/s/ Robert T. Keeton III  
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